

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GERALD M. McLAUGHLIN,)	
)	
Plaintiff)	
)	No. 07 C 6906
v.)	
)	Judge Der-Yeghiayan
RICHARD CASLER, individually and in his official capacity, KENNETH FRITZ, individually and in his official capacity, and the VILLAGE OF SCHAUMBURG,)	Magistrate Judge Brown
)	
)	
Defendants.)	JURY DEMANDED
)	

PARTIES' JOINT MOTION TO EXTEND DISCOVERY

NOW COME the Parties, by and through their attorneys, and hereby move the Court to extend the discovery cutoff date in this matter. In support of this motion, the Parties state as follows:

1. This Court set a discovery cutoff date of August 1, 2008.
2. Both Parties have initiated written discovery in this case.
3. Plaintiff has suffered a stroke and has been engaged in extensive physical therapy as part of his recovery from his stroke. His stroke and his efforts to recover from his stroke have made it difficult for him to assist in providing answers to Defendants' written discovery.
4. Defendants noticed Plaintiff's deposition in April of 2008. Subsequent to the notice being issued, Plaintiff suffered his stroke and not attend the deposition.
5. Defendants have been unable to timely respond to Plaintiff's written discovery due to Defendants' attorney being involved in a large trial. Defendants will be unable to respond to Plaintiff's written discovery until after the discovery cutoff date of August 1, 2008.

6. As a result of the medical health issues of Plaintiff and the trial schedule of Defendants, both of which have prevented the Parties from timely answering discovery, the Parties seek an extension of the discovery cutoff date until October 3, 2008. If Plaintiff's health issues continue to prevent him from responding to the Defendants' discovery, including attending his deposition, the Parties will notify the Court immediately if it appears that Plaintiff's health issues may prevent the parties from completing discovery by October 3, 2008.

WHEREFORE, the Parties respectfully request that this Court grant an extension of the discovery cutoff date to and until October 3, 2008.

/s/ Arthur R. Ehrlich

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